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March 22, 2019

**VIA ECF**

Hon. I. Leo Glasser  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: U.S. v. Felix Sater, 98 Cr. 1101 (ILG)**

Dear Judge Glasser,

I represent defendant Felix Sater in the above-captioned matter and write to request a 30-day extension of time for Mr. Sater and the Government to file a response to the letter dated February 12, 2019, from Johnny Dwyer (ECF No. 247, “Mr. Dwyer’s Letter”), which seeks the complete unsealing of numerous sealed or redacted documents in this case. Mr. Sater and the Government’s response to Mr. Dwyer’s Letter is currently due Monday, March 25, 2019. (See ECF No. 248). For the reasons set forth below, the time needed for counsel to individually and collectively review the hundreds of pages of documents that are the subject of multiple sealing orders necessitates this request.

The documents involved in Mr. Dwyer’s request are different from those reviewed by Mr. Sater and the Government in connection with the most recent, extensive unsealing proceedings before U.S. District Judge Pamela K. Chen, who was acting by appointment of the Second Circuit to oversee the unsealing of the docket in Mr. Sater’s appellate case, *U.S. v. Doe*, 10-2905-cr (2d. Cir.). See *In Re the Appointment of Pamela K. Chen as Special Master*, 17-MC-1282 (PKC). Nevertheless, Judge Chen’s Special Master Report, which was adopted by the Second Circuit is, of course, relevant to this review and this Court’s determination of Mr. Dwyer’s request. In Judge Chen’s proceedings, defense counsel and the Government, working together, engaged in a diligent examination of the sealed documents at issue to provide the Court with the respective positions on whether or not continued sealing was appropriate.

The documents at issue here need to be reviewed in that same manner and compared with the rulings and positions taken by Mr. Sater and the Government in those prior proceedings. We have already had discussions with AUSA Temidayo Aganga-Williams and will be working together with his office, as before, to thoroughly and expeditiously file our position with the Court. However, due to schedules of counsel – AUSA Aganga-Williams is preparing for a trial which commences next week and counsel’s own case commitments – the extension requested is



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needed to complete this process. This is the first request by the defendant or the Government for an extension of time.

Accordingly, defense counsel and the Government respectfully request a 30-day extension of time to respond to Mr. Dwyer's Letter, from March 25, 2019, to April 24, 2019.

The Court's consideration is greatly appreciated.

Respectfully,  
/S/ Robert S. Wolf  
Robert S. Wolf

cc: All Parties via ECF